

Exhibit 1

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COREPHOTONICS, LTD.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

COREPHOTONICS, LTD.

Plaintiff,

vs.

APPLE INC.

Defendant.

Case No. 3:17-cv-06457-JD (Lead)
Case No. 5:18-cv-02555-JD

**EXHIBIT 1: DECLARATION OF JAMES
S. TSUEI IN SUPPORT OF
COREPHOTONICS, LTD.'S MOTION
FOR LEAVE TO AMEND
INFRINGEMENT CONTENTIONS**

1 I, James S. Tsuei, state as follows:

2 1. I am a member of the State Bar of California and an attorney at the firm of Russ,
3 August & Kabat, counsel for Plaintiff Corephotonics, Ltd. in the above captioned action. I have
4 personal knowledge of the facts set forth herein, and if called upon to testify, could and would
5 testify competently thereto.

6 2. I submit this declaration in support of Corephotonics' Supplemental Brief
7 Regarding Claim Construction.

8 3. Attached as Exhibit 2 is a computer-generated redline of Plaintiff Corephotonics'
9 second amended disclosure of asserted claims and infringement contentions, sent to Apple's
10 counsel on July 5, 2023, compared with the previously amended infringement contentions of July
11 26, 2022.

12 4. Attached as Exhibit 3 is a computer-generated redline of Plaintiff Corephotonics'
13 Exhibit L of Corephotonics' second amended disclosure of asserted claims and infringement
14 contentions, sent to Apple's counsel on July 5, 2023, compared with the previous Exhibit L of July
15 26, 2022.

16 5. Attached as Exhibit 4 is a true and correct copy of *Internap Corp. v. Noction,*
17 *Inc.*, C-15-03014-JD (N.D. Cal. Jan. 6, 2016), ECF No. 74 (Donato, J.).

18 6. Attached as Exhibit 5 is a true and correct printout of an email chain between
19 Corephotonics' counsel and Apple's counsel.

20 7. Attached as Exhibit 6 is a true and correct PDF printout of the Al Jazeera article,
21 "Israel's judicial crisis: How did we get there?" available at
22 <https://www.aljazeera.com/news/2023/3/27/timeline-how-did-israels-judiciary-protest-unfold>,
23 accessed August 2, 2023.

24 8. Attached as Exhibit 7 is a true and correct PDF printout of the BBC article "Israel
25 judicial reform explained: What is the crisis about?" available at
26 <https://www.bbc.com/news/world-middle-east-65086871>, accessed August 2, 2023.

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9. Attached as Exhibit 8 is a true and correct PDF printout of the New York Times article “Protests Intensify Despite Offer to Delay Broader Judicial Overhaul,” available at <https://www.nytimes.com/live/2023/07/24/world/israel-protests-vote>, accessed August 2, 2023.

10. Attached as Exhibit 9 is a true and correct PDF printout of the NPR article, “Hundreds of thousands march in Israel against Netanyahu’s judicial overhaul,” available at <https://www.npr.org/2023/07/22/1189627225/israel-protests-netanyahu-judiciary>, accessed August 3, 2023.

11. Russ August & Kabat received attorney-client privileged work product from Corephotonics regarding potential infringement of iPhone 14 models on October 18, 30, 31; November 3, 8, 16, 17, 19, 20, 22, 27, 28, 30, 31; Dec. 22, 28, and 29 of 2022; Jan. 3, 4, 10, 16; Mar. 9, 14, 16; and Apr. 16, 17, 18 of 2023.

I declare under penalty of perjury under the laws of the United States the foregoing is true and correct.

Executed on August 9, 2023 in Los Angeles, California.

By: /s/ James S. Tsuei
James S. Tsuei